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October 12, 2023

VIA ECF

Honorable Pamela K. Chen, United States District Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. McMahon, et al.*
Docket No. 21-cr-265

Dear Judge Chen,

As Your Honor is aware, this Firm represents Defendant Michael McMahon in the above-captioned matter. I write, with the consent of the Government, to respectfully request a short, one-week extension of time of the deadline for Mr. McMahon to file his reply brief in further support of his post-trial motions, which is currently due this Monday, October 16, 2023. I have been traveling for an important personal matter since the Government submitted its opposition brief on the evening of October 5, 2023, and returned to the office on October 10, 2023; given the length of the Government's opposition brief, and the importance of our response thereto, we propose, if it is satisfactory to the Court, an extension until Monday, October 23 2023; no further requests for additional time will be forthcoming in the absence of a genuine emergency. Again, the Government has very graciously consented to this request, which we genuinely appreciate.

If this schedule meets with Your Honor's approval, we would request that the Court So Order the relief sought in the space provided and file it on the Docket at Your Honor's convenience. Of course, if the Court has any questions or concerns, please do not hesitate to contact me. Thank you very much for your very kind consideration of this matter.

Respectfully submitted,

s/ Genna A. Conti
Genna A. Conti

SO ORDERED:

This ____ day of October, 2023

Honorable Pamela K. Chen
United States District Judge

cc: All counsel of record (via ECF)